


SW: USAO2016R00033

MAR 09 2016

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLANDAT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY  DEPUTY

UNITED STATES OF AMERICA

v.

DONTAE SMALL,

Defendant

*
* CRIMINAL NO. *CCB-16-086*
*
* (Conspiracy to Commit Carjacking,
* 18 U.S.C. § 371; Carjacking,
* 18 U.S.C. § 2119(1); Destruction of
* Government Property, 18 U.S.C. § 1361;
* Aiding & Abetting, 18 U.S.C. § 2)
*

INDICTMENTCOUNT ONE
(Conspiracy)

The Grand Jury for the District of Maryland charges that:

1. The defendant, **DONTAE SMALL**, is a resident of Baltimore City, Maryland.

2. In or about the evening hours of October 4, 2015, **SMALL** and his associates were together in a white minivan in the Federal Hill neighborhood of Baltimore City looking for victims to rob.

3. From on or about October 4, 2015 and continuing through on or about October 8, 2015, in the District of Maryland and elsewhere, the defendant,

DONTAE SMALL,

together with others known and unknown to the Grand Jury, did knowingly, willfully, and unlawfully combine, conspire, confederate and agree to commit an offense against the United States, that is, to take from the person and presence of another, by force, violence and intimidation, and with intent to cause death and serious bodily harm, a motor vehicle that had

been transported, shipped, and received in interstate commerce, in violation Title 18, United States Code Section 2119, which offense is commonly referred to as carjacking.

Object of the Conspiracy

4. It was the object of the conspiracy that **SMALL** and his co-conspirators would obtain money and property by canvassing the streets of residential neighborhoods looking for victims to rob.

Manner and Means of the Conspiracy

5. It was part of the conspiracy that **SMALL** and his co-conspirators would and did use a firearm and threats to rob victims of their money and property, including a motor vehicle.

Overt Acts

6. During the course of and in furtherance of the conspiracy, and to effect the objects thereof, at least one of the conspirators committed or caused to be committed at least one of the following acts, among others, in the District of Maryland and elsewhere:

a. At or about 10 p.m. on October 4, 2015, **SMALL** and his co-conspirators used a white mini-van to covertly look for victims to rob in a residential neighborhood in Baltimore City.

b. At or about 10:09 p.m. on October 4, 2016, **SMALL** used a cellular telephone to communicate with a male conspirator by texting him the following message: "Get the dude cpming down da st.I parked on smoking a pipe" [sic].

c. At some time after 10:09 p.m. on October 4, 2016, three of the co-conspirators approached Victim 1 on Covington Street in Baltimore City.

d. At some time after 10:09 p.m. on October 4, 2016, one of the co-conspirators brandished a silver handgun at Victim 1, and asked what was in his pockets.

e. At some time after 10:09 p.m. on October 4, 2015, one of the co-conspirators demanded that Victim 1 relinquish the keys to Victim 1's car, a 2008 Acura TSX. The car was then taken.

f. At some time at or about 10 p.m. on October 4, 2015, two of the co-conspirators, one armed, brandished a silver handgun at Victim 2 and Victim 3, and asked what was in Victim 2's pockets.

g. At some time at or about 10 p.m. on October 4, 2015, a conspirator snatched a cellular telephone that had fallen from Victim 3's pocket as Victim 2 and Victim 3 fled.

h. On or about October 4, 2015, the co-conspirators took the 2008 Acura TSX belonging to Victim 1.

i. Beginning at least in or about the evening of October 7, 2015, **SMALL** took and drove the 2008 Acura TSX from Baltimore City to Anne Arundel County, Maryland.

18 U.S.C. § 371

COUNT TWO
(Carjacking)

The Grand Jury for the District of Maryland charges that:

1. The allegations of Paragraphs 1, 2 and 6 of Count One are incorporated here.
2. On or about October 4, 2015 and continuing through on or about October 7, 2015,
in the District of Maryland and elsewhere, the defendant,

DONTAE M. SMALL,

with the intent to cause death and serious bodily harm, took, and aided and abetted the taking of, a motor vehicle, specifically, a 2008 Acura TSX, that had been transported, shipped, and received in interstate and foreign commerce from and in the presence of a person by force, violence, and intimidation.

18 U.S.C. § 2119(1)

18 U.S.C. § 2

COUNT THREE
(Destruction of Government Property)

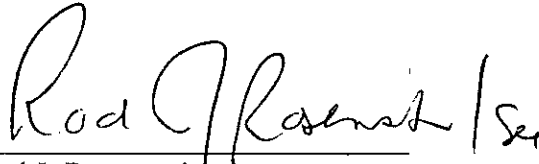
The Grand Jury for the District of Maryland charges that:

1. The allegations of Paragraphs 1, 2 and 6 of Count One are incorporated here.
2. On or about October 7, 2015, in the District of Maryland, the defendant

DONTAE SMALL,

willfully did injure and attempt to injure and commit a depredation against property of the United States and of any department or agency thereof, and property which had been manufactured and constructed for the United States, and any department or agency thereof, specifically, the defendant drove and crashed a motor vehicle into a security gate protecting the property of the National Security Agency, Ft. Meade, Maryland, and the resulting damage was greater than \$1,000.

18 U.S.C. § 1361


Rod J. Rosenstein
United States Attorney

A TRUE BILL:

SIGNATURE REDACTED

Foreperson

Dated: March 9, 2016